

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:22-CV-293-JRG
)	
SAMSUNG ELECTRONICS CO., LTD.,)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS AMERICA,)	
INC., SAMSUNG SEMICONDUCTOR,)	
INC.,)	
)	
Defendants.)	

**PLAINTIFF NETLIST, INC.’S MOTION TO EXCEED PAGE LIMITS FOR EXHIBITS
SUPPORTING CONTINGENT MOTION FOR RELIEF FROM PROTECTIVE
ORDER**

Plaintiff Netlist, Inc. (“Netlist”) hereby moves for leave to file 165 pages of supporting exhibits to support its Motion for Contingent Relief from Protective Order (the “Motion”), in excess of the page limits imposed by paragraph 10 of the Discovery Order. Netlist informed opposing counsel of its intent to file this motion and Samsung refused to take a position on whether it opposed, though it previously agreed to a reciprocal expansion of the exhibit page limit for Netlist’s response to its Motion for Relief. *See* Dkt. 717.

Netlist moves for leave to ensure that the Court has full access to the documents Netlist seeks to present to the Central District of California (“CDCA”) court pursuant to its concurrently filed Contingent Motion for Relief from the Protective Order. Netlist is mindful of the Court’s limited time and resources. Netlist thus submits this motion only so that the Court may have sufficient explanation of the facts and issues, not to put irrelevant or duplicative information before the Court. In order to minimize the burden on the Court, Netlist proposes to attach only a representative sample of

documents, including the most relevant documents, referenced in the Motion, rather than all of the subject documents, which are listed in Exhibit 9 to the Motion at pages 16-17. If, however, the Court would prefer to review all documents addressed by the Motion, Netlist can provide copies of those as well.

Dated: July 2, 2024

Respectfully submitted,

/s/ Jason Sheasby

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Attorneys for Plaintiff Netlist, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on July 2, 2024, a copy of the foregoing was served to all counsel of record.

/s/ Isabella Chestney
Isabella Chestney

CERTIFICATE OF CONFERENCE

I hereby certify that, pursuant to L.R. 7(h), our team informed counsel of record for Samsung on the subject of this motion on July 2, 2024. Samsung refused to take a position on whether it opposed providing Netlist with an expansion for this motion, but previously agreed to a reciprocal expansion of the exhibit page limit for Netlist's response to Samsung's mirror-motion. *See* Dkt. 717.

/s/ Jason Sheasby
Jason Sheasby